

January 31, 2006

Ms. Selica Potter
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State Water Resources Control Board
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CERTIFIED MAIL
RETURN RECEIPT REQUESTED



303 (d) Deadline: 1/31/06

Dear Ms. Potter:

Comments Regarding The State Water Resources Control Board (SWRCB) Proposed Revisions, Federal Clean Water Act (CWA) Section 303(d) List of Water Quality Limited Segments For California

The Metropolitan Water District of Southern California (Metropolitan) appreciates your extension of the public comment period and providing us this opportunity to submit comments on the SWRCB Proposed Revisions to the CWA Section 303(d) List of Water Quality Limited Segments For California [Section 303(d) List]. Metropolitan distributes wholesale water to our 26 Member Agencies (cities and water districts) and supplies more than one-half of the water used by approximately 18 million people in the 5,200 square-mile coastal plain of Southern California. To provide this service, Metropolitan operates an extensive system of water conveyances, drinking water storage reservoirs, and water treatment facilities.

Metropolitan imports water from the Colorado River and Northern California to supplement local drinking water supplies. We also help our Member Agencies to develop increased water conservation, recycling, storage, and other water management programs. As a drinking water supplier, we are naturally concerned with protecting water quality and we are actively involved in source water protection efforts to prevent degradation of our sources of water supply. Metropolitan welcomes and encourages the support of the SWRCB and the Regional Water Quality Control Boards (RWQCBs) in helping to protect water quality throughout California. The comments herein reflect Metropolitan and our Member Agency's views and concerns as affected agencies.

Background

Metropolitan and many of our Member Agencies own and operate drinking water storage lakes and reservoirs in Southern California in order to provide an adequate and reliable supply of drinking water. These lakes and reservoirs are extensively managed special-purpose water bodies that receive imported water from the Colorado River and Northern California for storage. The water is then treated to meet stringent drinking water standards before delivery to the public. The storage of imported water is an essential part of providing drinking water to Southern California.

Issues

Total Dissolved Solids In Imported Water:

Due to the critical need to import water, some drinking water reservoirs may contain higher levels of Total Dissolved Solids (TDS) because Colorado River water has naturally occurring higher levels of TDS. In some circumstances, TDS levels in imported Colorado River water can exceed existing RWQCB Basin Plan TDS water quality objectives. Unfortunately, many of these water quality objectives, which were established years ago, are based on limited information and do not take it to account the need for storage of imported water in the region. Metropolitan and our Member Agencies are currently trying to work with the RWQCBs to rectify the problem but this can be a long process.

Further, the proposed 303(d) listing for the Sweetwater, El Capitan, Miramar, Murray and San Vicente Reservoirs incorrectly state that the TDS water quality objective for all beneficial uses, including municipal and domestic supply (MUN), is 500 mg/L. The San Diego RWQCB Basin Plan establishes a TDS water quality objective for the MUN designation equal to the California Department of Health Services (DHS) secondary standard which has an upper limit of 1,000 mg/l. It would be inadvisable and detrimental to all stakeholders for the SWRCB to list these drinking water lakes and reservoirs as impaired for TDS.

Naturally Occurring Constituents:

Due to the erosion of geological deposits, naturally occurring elements such as aluminum, manganese, and other metals are sometimes found in drinking water storage lakes and reservoirs. There are no viable methods for the removal or elimination of these naturally occurring elements in the water body. However, these constituents are regulated by the California Department of Health Services, and treated drinking water served to the public meets the regulatory standards.

Decreased Dissolved Oxygen (DO) Level Due to Seasonal Stratification:

Seasonal stratification commonly occurs as a natural process in lakes and reservoirs used to store drinking water. Stratification can result in DO levels in the water column that do not meet water quality objectives. This process occurs naturally due to temperature changes, and there is no viable means to prevent this process.

Ms. Selica Potter
Page 3
January 30, 2006

Recommendation:

Metropolitan recommends that the SWRCB revise the "Water Quality Control Policy for Developing California's Clean Water Act Section 303(d) List" to specify that water bodies specifically owned/operated by drinking water utilities for the primary purpose of storing drinking water should not be considered for listing as impaired if the exceedance of a water quality objective is due to:

- Storage of imported Colorado River water to supply drinking water;
- Naturally occurring constituents in the water body; and
- Unavoidable natural processes like seasonal stratification that cause decreased DO levels.

Implementing this recommendation would provide a more practical and reasonable approach to the Section 303(d) listing process since these specific types of water quality objective exceedances in drinking water lakes and reservoirs:

- are not caused by point and non-point source dischargers that can be regulated and controlled and therefore cannot be mitigated through the TMDL process; and
- do not impact the MUN designated use or public drinking water quality because the water is treated at water treatment facilities to meet stringent drinking water standards prior to distribution to the public.

It is strongly recommended that this approach be implemented to remove such water body impairment listings from the SWRCB's proposed 2006 Section 303(d) List prior to adoption. Since the implications of a water body being included on the Section 303(d) List can be costly and time consuming (for the SWRCB, RWQCB, and all stakeholders), it is critical that unnecessary and unreasonable listings be avoided so that true water quality problems can be addressed and public funds are not wasted.

Metropolitan appreciates the opportunity to work with the SWRCB on the proposed revisions to the Section 303(d) List. Thank you for your consideration of our recommendations. If you have any questions regarding these comments, please contact Ms. Marcia Torobin at (213) 217-7830.

Very truly yours,

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Page 4

January 30, 2006

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